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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

APR 15 1994

In the Matter of Amendment of Parts 2	)	
and 15 of the Commission's Rules to	)	
Permit Use of Radio Frequencies Above	)	ET Docket No. 94-124
40 GHz for New Radio Applications	)	
	)	
Petition of Sky Station International, Inc.	)	RM-8784
for Amendment of the Commission's Rules	)	
to Establish Requirements for a Global	)	
Stratospheric Telecommunications Service	)	
in the 47.2-27.5 GHz and 47.9-48.2 GHz	)	
Frequency Bands	)	

To: The Commission

**REPLY COMMENTS OF  
HARRIS CORPORATION - FARINON DIVISION**

Pursuant to Section 1.415 of the Commission's rules, Harris Corporation - FARINON Division ("Harris") hereby submits its Reply Comments in the above-captioned proceeding.

Harris is a leading manufacturer of terrestrial fixed microwave equipment used extensively in the United States and exported throughout the world. For this reason, Harris is interested in the spectrum aspects of the Sky Station International ("Sky Station") petition.

**REPLY COMMENTS OF  
TELECOMMUNICATIONS INDUSTRY ASSOCIATION ARE SUPPORTED**

Harris strongly supports the Reply Comments being filed separately in this proceeding by the Telecommunications Industry Association ("TIA"). As a matter of fact,

*[Handwritten signature]*  
TIA

Harris contributed substantially to those Reply Comments. Harris would go on to say the public interest might benefit from a more in-depth discussion to define the long term nature of the interesting new Sky Station concept. The relationship of Fixed vs. Mobile vs. Satellite Services could thereby be clarified. The creation of a new Global Airborne Telecommunications Service might be the best long term solution to accommodate various airborne services that will have similar characteristics including those of Sky Station. Again, the Reply Comments being filed by TIA are strongly supported.

#### COMMENT BY HUGHES CONCURRED IN

In its Comments, Hughes Communications, Inc. ("Hughes") expressed concern over what it sees as a growing trend in spectrum management. Hughes pointed out that "systems are designed and promoted without regard to other planned uses of radio spectrum and the other uses (that have been planned for decades) are summarily displaced..." (Hughes Comments, p. 3)


Even though Harris might not have an issue with the future use of the 47.2-48.5 GHz band, the fact is that Fixed Service ("FS") users are threatened with being displaced summarily from the "28 GHz" band to accommodate other services. In a similar vein, rigidly designed satellite systems are now threatening the viability of FS spectrum in the 18, 23, 26 and 38 GHz bands. Harris in principle shares the concerns being expressed by TIA in its Reply Comments on this point.

## CONCLUSION

Noting the conclusions incorporated in the Reply Comments of TIA, Harris urges the Commission to assure that approval of GSTS takes into account spectrum management concerns, noting the warning expressed by Hughes in its Reply Comments and further addressed above. Other spectrum user interests need to be borne in mind in making spectrum allocation changes.

Respectfully submitted,

HARRIS CORPORATION - FARINON DIVISION

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May 15, 1996

# CERTIFICATE OF SERVICE

I, Eric Fishman, hereby certify that a copy of the foregoing Reply Comments of Harris Corporation - FARINON Division was sent this 15th day of May, 1996, via first class United States mail, postage prepaid, to the following:

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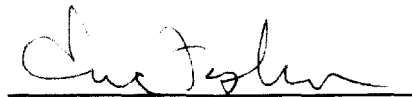
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